

CERRO COPPER PRODUCTS CO.

P.O. Box 66800 St. Louis, MO 63166-6800 618/337-6000 1631210008C.5 ST. CLAIR 9/02/91 CERRO COPPER PRO PERMIT

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September 22, 1992

Illinois Environmental Protection Agency Bureau of Land Environmental Information Support Unit P.O. Box 19276 Springfield, Illinois 67294-9276

Re: Initial Facility Report - On-Site Inert Landfill Cerro Copper Products Co. Sauget, Illinois I.D. # 1631210008 - St. Clair County

Dear Madam or Sir:

This letter is written in response to your September 16, 1992 letter and phone conversations on September 17 & 18, 1992 with Mr. D. Van Nattan concerning Cerro's old On-site Landfill. Cerro discontinued use of its permit exempt inert landfill prior to March 1, 1991. We understood from Mr. Van Nattan that Cerro is only required to submit an Initial Facility Report to conclude its obligation under the applicable regulations.

Attached are the Initial Facility Report and a general summary of the history of the site, and its current status.

We request that the Agency provide a written notice confirming that closure is complete. If you should have any questions or there are any other requirements with which Cerro must comply, please do not hesitate to phone or write this office.

Very truly yours,

CERRO COPPER PRODUCTS CO

Joseph M. Grana

Manager of Environmental

and Energy Affairs

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**IEPA/DLPC** 

## SUMMARY OF CERRO'S ON-SITE INERT LANDFILL FACILITY

Between 1955 and 1969 Cerro purchased several parcels of land totaling approximately 17 acres, located to the east of its property. This land was used by Cerro from that time until March 1, 1991 as a landfill for inert material, generally concrete, metallics, brick, construction and demolition debris. Cerro also uses the land for the storage of its copper tube products in trailers, parking of empty trailers, storage of salvageable and usable old equipment, reclamation storage area for refractory brick prior to being reclaimed and waste dumpster storage. It is estimated that during the 37 years Cerro has owned at least a portion of the land, Cerro has placed between 1 to 8 feet of cover over the 17 acres depending on the slope of the land. This is approximately 27,500 yds to 220,000 yds of inert material which may have been landfilled during the 37 years.

Prior to Cerro's purchase of the land, the southern most portion of the land was used by the previous owner as a gravel pit/landfill area. This fact is documented in an Ecology & Environment, Inc report prepared for the Illinois Environmental Protection Agency, Division of Land Pollution Control dated May 1988. The report is titled "Expanded Site Investigation Dead Creek Project Sites at Cahokia/Sauget, Illinois Final Report." The area in question is noted as Site I of Area 1 in the report. Cerro does not have any way of determining the amount of material or the type of material the previous owners landfilled.

The current condition of the area is as follows:

- 1. Cerro discontinued the use of this area for inert material landfilling prior to March 1, 1991. We also do not plan to use this area in the future for disposal but only for storage as indicated above. Cerro has notified all relevant plant personnel that the area is to be used for storage only.
- 2. The area is fenced and the gates are controlled by Cerro's security force. There is no public access to the area. Additionally Cerro maintains perimeter cameras and continuous perimeter patrols by its full time Security Department.
- 3. The majority of the surface is tightly packed crushed stone. However, there are some small portions of the surface that have fill dirt and debris as its surface with some vegetation growth.
- 4. Surface drainage is either toward public roadways or toward a rainwater control ditch. Both drainages ultimately drain to the Village of Sauget Wastewater treatment system since the system is a combined sewer system.